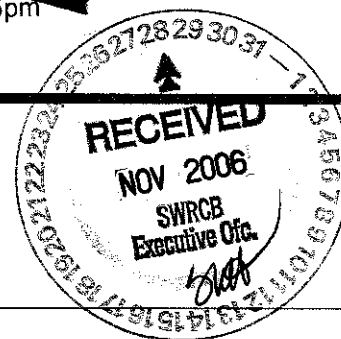


commentletters - Comment letter - Sediment Quality Objectives



From: <Usha_Vedagiri@URSCorp.com>
To: <commentletters@waterboards.ca.gov>
Date: 11/28/2006 4:17:38 PM
Subject: Comment letter - Sediment Quality Objectives

Please find below my comments on the CEQA Scoping Meeting Informational Document. My comments and questions are not in any particular order.

- 1) The Board is to be commended for the level of effort and thought that has been put into developing an SQO framework with a sound technical basis while at the same recognizing the limitations of available data and methods.
- 2) Please consider the addition of bioaccumulation-based SQOs for the protection of aquatic and sediment-dependent wildlife such as benthivorous and piscivorous wildlife. There may be many waterbodies where human consumption of fish and shellfish may be present or absent but resident and migratory wildlife (both listed and non-listed species) could also be exposed to contaminants in sediment through the food-web.
- 3) Please clarify whether the proposed MLOE approach has to be used in its entirety for all sites and stations being evaluated. This may involve a considerable expenditure of time and costs for every evaluation. Although using sediment chemistry alone, as a tool to evaluate sediments, certainly has its pitfalls, there are many cases where it is used as the first tier in a tiered approach to evaluating sediment quality. In a tiered approach, additional lines of evidence such as toxicity tests and benthic community studies are used only if the sediment chemistry results exceed designated screening levels.
- 4) At this time, the management goals and actions that would result from the final classification of a site, from unimpacted to clearly impacted are not clear, especially for the intermediate classifications.
- 5) There are some water bodies (e.g., SF Bay) where the occurrence of "ambient and seasonal toxicity" to benthic organisms is known to occur and may actually fall into the "moderate effects range". It would be useful to include these concepts in the implementation discussion.

I look forward to seeing the development of the Phase 2 work and the development of SQOs for the deltas and estuaries.

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